	Case 3.11-cv-00030-1EG -vvvG Document 1	o Tiled 02/04/11 Tage Tol 4	
1	KURTIS D. MACFERRIN (State Bar No. 178006)		
2	CORA L. SCHMID (State Bar No. 237267) LIFE TECHNOLOGIES CORPORATION		
3	850 Lincoln Centre Dr. Foster City, CA 94404		
4	Telephone: (650) 638-6245 Facsimile: (677) 638-6677		
5	E-mail: kurtis.macferrin@lifetech.com E-mail: cora.schmid@lifetech.com		
6 7	Attorneys for Defendant LIFE TECHNOLOGIES CORPORATION		
8	KARL RUPP (State Bar No. 168930)		
9	KENDAL LAW GROUP, LLC 3232 McKinney Avenue, Suite 700		
10	Dallas, Texas 75204 Telephone: (214) 744-3000		
11	Facsimile: (214) 744-3015 Krupp@kendalllawgroup.com		
12	Attorney for Plaintiff TROLL BUSTERS® LLC		
13			
14	UNITED STATES DISTRICT COURT		
15	SOUTHERN DISTRICT OF CALIFORNIA		
16	TROLL BUSTERS ® LLC,	CASE NO. 11-CV-0056-IEG (WVG)	
17	Plaintiff,	JOINT MOTION TO EXTEND DEFENDANT LIFE	
18	v.	TECHNOLOGIES CORPORATION'S TIME TO	
19	ROCHE DIAGNOSTICS GMBH, ROCHE MOLECULAR SYSTEMS (RMS), ROCHE	ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S	
20	APPLIED SCIENCES EUROGENTEC NORTH AMERICA INC., CLONTECH	COMPLAINT	
21	LABORATORIES INC., INTEGRATED DNA TECHNOLOGIES (IDT), LIFE		
22	TECHNOLOGIES CORPORATION, QIAGEN NV., THERMO FISHER SCIENTIFIC,		
23	INC., QUANTA BIOSCIENCES, INC., GENE LINK INC., GENSCRIPT USA INC., EMD	·	
2425	CHEMICALS INC., TRILINK BIOTECHNOLOGIES INC., and CEPHIED,		
26	Defendants		

-1-

JOINT MOTION TO EXTEND TIME FOR LIFE TECH. TO RESPOND TO COMPLAINT

27

28

11-CV-0056-IEG (WVG)

1	COME NOW THE PARTIES, Defendant, Life Technologies Corporation ("Life		
2	Technologies"), by and through its counsel, and Plaintiff Troll Busters LLC ("Plaintiff") by and		
3	through its counsel, and pursuant to Local Rules 7.2 and 12.1, hereby jointly move the Court to		
4	enter an order extending the time for Life Technologies to answer or otherwise respond to		
5	Plaintiff's Original Complaint in the above-captioned matter until March 25, 2011.		
6	Good cause exists for extending Life Technologies' time to answer or otherwise respond,		
7	because Life Technologies needs time to investigate the claims in this action, and explore early		
8	settlement possibilities with the Plaintiff. Life Technologies and Troll Busters stipulate and		
9	agree that the parties to this motion reserve all rights and defenses they may have and that entry		
10	of this order shall not impair or otherwise affect such rights and defenses.		
11			
12	Dated: February 4, 2011	LIFE TECHNOLOGIES CORPORATION	
13	<u>/</u>	s/ Cora L. Scmid	
14	1	Cora L. Schmid Attorney for Defendant	
15		LIFE TECHNOLOGIES CORPORATION	
16			
17	Dated: February 4, 2011	KENDALL LAW GROUP, LLP	
18	<u>/</u>	s/ Karl Rupp	
19		Karl Rupp, Esq. ATTORNEY FOR PLAINTIFF	
20	11	FROLL BUSTERS ®, LLC	
21	Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures of the United States District Court for the Southern District of California, I certify that the content of this document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Karl Rupp to affix his electronic signature to this document.		
22			
23			
24	Dated: February 4, 2011	LIFE TECHNOLOGIES CORPORATION	
25	<u>/</u>	s/ Cora L. Semid	
26	1	Cora L. Schmid	
27		Attorney for Defendant LIFE TECHNOLOGIES CORPORATION	
28	JOINT MOTION TO EXTEND TIME FOR LIFE TECH. TO RESPOND TO COMPLAINT -2-	11-CV-0056-IEG (WVG)	

Troll Busters©, LLC v. Roche Diagnostics GMBH, et al. U.S. District Court Case No. 11CV0056 IEG (WVG)

,

__

JOINT MOTION TO EXTEND TIME FOR LIFE TECH. TO RESPOND TO COMPLAINT

CERTIFICATE OF SERVICE

I, Patricia D. Hoekman, hereby certify that I am over 18 years of age, employed in the County of San Diego, California, in which county the within-mentioned service occurred; I am employed in the office of a member of the California State Bar who is permitted to practice before this Court, at whose direction the service stated below was made; and that I am not a party to the subject action. I am familiar with the United States District Court, Southern District of California's practice for collecting and processing electronic filings. Under that practice, documents are electronically filed with the Court. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document. Registration as a CM/ECF user constitutes consent to the electronic service through the Court's transmission facilities. Under said practice, the following parties were served via CM/ECF with the below-listed documents:

PARTIES SERVED:

Karl Rupp, Esq.
KENDALL LAW GROUP, LLC
3232 McKinney Avenue, Suite 700
Dallas, TX 75204
Tel: (214) 744-3000
Fax: (214) 744-3015
Email: krupp@kendalllawgroup.com

Attorney for Plaintiff
TROLL BUSTERS©, LLC

DOCUMENTS SERVED:

- 1. JOINT MOTION TO EXTEND DEFENDANT LIFE TECHNOLOGIES CORPORATION'S TIME FOR FILING OF RESPONSIVE PLEADING
- 2. [PROPOSED] ORDER GRANTING JOINT MOTION TO EXTEND DEFENDANT LIFE TECHNOLOGIES CORPORATION'S TIME TO FILE REPONSIVE PLEADING

11-CV-0056-IEG (WVG)

Case 3:11-cv-00056-IEG -WVG Document 13 Filed 02/04/11 Page 4 of 4